

1 HONORABLE BENJAMIN H. SETTLE
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9 UNITED STATES DISTRICT COURT
10 WESTERN DISTRICT OF WASHINGTON
11 AT TACOMA

12 CHARLES REED,

13 Plaintiff,

14 v.

15 STEVEN HAMMOND, *et al.*,

16 Defendants.

17 No.: 3:16-cv-05993-BHS-DWC

18 **STIPULATED MOTION AND
19 AGREED ORDER FOR LIMITED
20 REOPENING OF DISCOVERY**

21 **I. STIPULATED MOTION**

22 The parties stipulate and agree to a limited reopening of discovery for the purpose of
23 exchanging Plaintiff Charles Reed's medical records from the Department of Corrections
24 preceding his release in 2023 that have not already been produced, as well as his medical records
25 from the Veteran's Association Hospital where he has been seeking care since his release. All
26 documents are to be timely exchanged following this Stipulation being granted by the Court. The
parties further stipulate and agree that the documents exchanged may be provided to their
witnesses designated as experts for the purposes of supplementing any expert report, the
supplement of which must be exchanged no later than October 4, 2024. The parties further stipulate
and agree that should this exchange of information and supplemented reports not be reasonably
possible prior to October 4, 2024, that the parties will promptly request the Court for a short trial
continuance.

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28 STIPULATION AND ORDER FOR LIMITED
29 REOPENING OF DISCOVERY
30 (No.: 3:16-CV-05993-BHS-DWC - 1)

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1 DATED this 6th day of September, 2024

2 K&L GATES LLP

3 By: s/ Monica A. Romero

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Attorneys for Defendants

STIPULATION AND ORDER FOR LIMITED
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(NO.: 3:16-CV-05993-BHS-DWC - 2)

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1 **II. ORDER**

2 Pursuant to the Parties' stipulation, it is so ordered.

3 DATED this 6th day of September, 2024.

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9 BENJAMIN H. SETTLE
10 United States District Judge

11 STIPULATED AND PRESENTED this 6th day of September, 2024, by:

12 K&L GATES LLP

13 By: s/ Monica A. Romero

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26 *Attorneys for Defendants*

STIPULATION AND ORDER FOR LIMITED
REOPENING OF DISCOVERY
(NO.: 3:16-CV-05993-BHS-DWC - 3)

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on September 6, 2024, I electronically filed the foregoing document
3 with the Clerk of the Court using the CM/ECF system, which will send notice to all parties and
4 counsel of record.

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6 Dated at Seattle, Washington, on September 6, 2024.

7 *s/ Monica A. Romero*

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STIPULATION AND ORDER FOR LIMITED
REOPENING OF DISCOVERY
(NO.: 3:16-CV-05993-BHS-DWC - 4)

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